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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DOUGLAS VASQUEZ, individually and
on behalf of all others similarly situated,

Plaintiff

vs.

GIBRALTAR HOSPITALITY
SERVICES, LLC d/b/a and a/k/a 7TH
AND CARSON;
EMPLOYEE(S)/AGENT(S) DOES 1-10;
and ROE CORPORATIONS 11-20;
inclusive,

Defendant

Case No. 2:23-cv-00441-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
SETTLEMENT PAPERWORK**

(Second Request)

Plaintiff Douglas Vasquez ("Plaintiff" or "Vasquez") and Defendant Gibraltar Hospitality Services, LLC d/b/a and a/k/a 7th and Carson ("Defendant") (together the "Parties"), by and through their respective counsel of record, hereby stipulate and respectfully request a ten (10) day extension up to and including **December 7, 2023** to file their proposed settlement and motion for preliminary approval of class action settlement. This is the Parties' second request for such an extension.

In support of this request, the Parties provide the following information for the Court's consideration:

1. On October 11, 2023, the Parties filed their Notice of Settlement

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1 advising the Court that the parties were preparing and exchanging appropriate
2 settlement paperwork and anticipated thereafter seeking approval of such class
3 action settlement pursuant to Rule 23(e) of the Federal Rules of Civil Procedure
4 and our law. See ECF No. 16.

5 2. On October 30, 2023, this Court ordered Plaintiff to submit a
6 proposed settlement along with a motion for preliminary approval of class action
7 settlement on or before November 13, 2023. See ECF No. 17.

8 3. This Court previously granted the parties' first requested extension
9 to November 27, 2023. ECF No. 19.

10 4. The parties continue to diligently work together in good faith
11 regarding such requisite settlement paperwork.

12 5. Specifically, the parties have exchanged their draft Joint Stipulation
13 of Settlement and Release with corresponding proposed exhibits thereto as well as
14 Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement.
15 Defendant is currently reviewing the extensive documentation and the parties
16 anticipate circulating the documents for final approval and signature following such
17 review.

18 6. Further, the parties have also diligently drafted, exchanged, and
19 executed settlement paperwork in their separate NLRB matter.

20 To complete such necessary review and achieve finalization of the
21 settlement paperwork, including the anticipated motion for preliminary approval of
22 class action settlement, the Parties respectfully request a ten (10) day extension,
23 up to and including **December 7, 2023**, to file the proposed settlement along with a
24 motion for preliminary approval of class action settlement.

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1 This stipulation is made in good faith, not for purposes of delay or burden,
2 and pursuant to our Rules. No parties are prejudiced by this Stipulation.

3 Respectfully submitted this 27th day of November 2023.

4 GABROY | MESSER

FISHER & PHILLIPS LLP

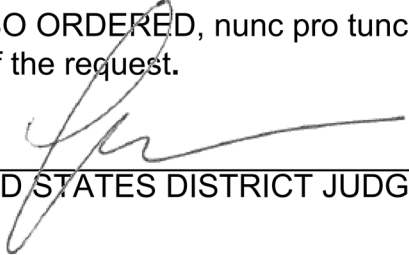
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10 Attorney for Plaintiff Douglas Vasquez

Attorneys for Defendants Gibraltar
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11 7th and Carson

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15 IT IS SO ORDERED, nunc pro tunc, to the
date of the request.

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UNITED STATES DISTRICT JUDGE

18 Dated: November 30, 2023
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